

**HEARING DATE AND TIME: November 13, 2015 at 12:00 p.m. (Eastern Time)**  
**OBJECTION DEADLINE: November 6, 2015 at 4:00 p.m. (Eastern Time)**

Bennette D. Kramer  
Schlam Stone & Dolan LLP  
26 Broadway  
New York, NY 10004  
(212) 344-5400  
bdk@schlamstone.com

*Attorneys for the International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
-----X

**JOINDER OF THE INTERNATIONAL BANK FOR RECONSTRUCTION AND  
DEVELOPMENT AS TRUSTEE OF THE RETIRED STAFF BENEFITS PLAN AND  
TRUST TO THE OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND  
CITADEL EQUITY FUND LTD. TO THE MOTION TO RENEW MOTION TO ALLOW  
DISCLOSURE OF DERIVATIVES QUESTIONNAIRES PURSUANT TO SECTION  
107(a) OF THE BANKRUPTCY CODE**

The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust, by and through its undersigned counsel, hereby joins in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the “Citadel Objection to the Motion”) filed to the Motion to Renew Motion to Allow Disclosure of Derivatives Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”), as follows:

**OBJECTION AND JOINDER**

The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust and the Debtors were parties to certain derivative contracts.

1. The International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust hereby joins and incorporates by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 51379].

WHEREFORE, for the foregoing reasons, the International Bank for Reconstruction and Development as trustee of the Retired Staff Benefits Plan and Trust respectfully requests that this Court deny the Debtors' Motion to Renew Motion to Allow Disclosure of Derivatives Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, to (a) narrow the disclosure of the Derivatives Questionnaires to only the information included in the calculation statements that is relevant to the valuation of individual trades and (b) allow claimants to redact all identifying, confidential and proprietary information from any calculation statement excerpts, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York  
November 6, 2015

SCHLAM STONE & DOLAN LLP

By: s/ Bennette D. Kramer

Bennette D. Kramer (BK-1269)  
Schlam Stone & Dolan LLP  
26 Broadway  
New York, NY 10004  
(212) 344-5400  
bdk@schlamstone.com

*Attorneys for the International Bank for  
Reconstruction and Development as trustee of the  
Retired Staff Benefits Plan and Trust*

OF COUNSEL  
Lauren Teigland-Hunt  
Teigland-Hunt LLP  
127 West 24<sup>th</sup> Street, 4<sup>th</sup> Floor  
New York, NY 10011  
(212) 269-1600  
lth@t-hllp.com